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16

17 **STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA**

19

20 DEMETRIC DI-AZ, OWEN DIAZ AND  
LAMAR PATTERSON

Case No. 17-cv-06748-WHO

21

Plaintiffs,

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE TO FILE  
DISCOVERY DISPUTE LETTER**

22

v.

23

24 TESLA, INC. DBA TESLA MOTORS,  
INC., CITISTAFF SOLUTIONS, INC.;  
WEST VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES,  
INC.; NEXTSOURCE, INC.; and  
25 DOES 1-10, inclusive

FAC Filed:  
Trial Date:

December 26, 2018  
March 2, 2020

26

Defendants.

27

28

1 Pursuant to Northern District of California Civil Local Rules 6-2 and 7-12, Plaintiffs  
 2 DEMETRIC DI-AZ and OWEN DIAZ (“Plaintiffs”) and Defendant CITISTAFF SOLUTIONS,  
 3 INC. (“CitiStaff”), by and through their respective counsel, hereby stipulate and agree as follows:

4 WHEREAS, Plaintiff filed the First Amended Complaint on December 26, 2018. (Dkt. No.  
 5 57). Defendant Answered the First Amended Complaint on January 1, 2019. (Dkt. No. 63).

6 WHEREAS, the Court’s July 17, 2019 Civil Pretrial Order set the fact discovery cutoff for  
 7 October 11, 2019. (Dkt. No. 78.)

8 WHEREAS, Civil Local Rule 37-3 provides that parties must file all motions to compel  
 9 discovery no more than 7 days after the fact discovery cut-off date.

10 WHEREAS, pursuant to Civil Local Rule 37-3 and the Civil Pretrial Order, all discovery  
 11 disputes must be raised with the Court no later than October 18, 2019.

12 WHEREAS, Plaintiffs initiated the meet and confer process regarding CitiStaff’s objections  
 13 to Plaintiffs’ Third Amended Notice of Videotaped Deposition of CitiSaff Solutions, Inc.’s Person  
 14 Most Knowledgeable Pursuant to Fed. R. Civ. P. 30(B)(6); and Request for Production of  
 15 Documents on September 6, 2019 (the “PMK Deposition Notice”).

16 WHEREAS, Plaintiffs and CitiStaff met and conferred in person in an attempt to resolve  
 17 their dispute on September 9, 2019.

18 WHEREAS, Plaintiffs and CitiStaff are continuing the meet and confer process, and seeking  
 19 to come to a compromise without enlisting the Court’s assistance.

20 WHEREAS, Plaintiffs and CitiStaff believe that they can reduce or eliminate the need to  
 21 enlist the Court’s assistance in resolving their dispute if they have additional time to meet and confer  
 22 regarding Citistaff’s objections to the PMK Deposition Notice.

23 WHEREAS, Plaintiffs and CitiStaff agree to extend Plaintiffs’ deadline to raise their dispute  
 24 regarding CitiStaff’s objections to the PMK Deposition Notice to October 30, 2019, to allow the  
 25 parties additional time to negotiate an informal resolution of their dispute.

26 WHEREAS, the Court signed the Order extending the time for the Parties to resolve the  
 27 dispute on October 21, 2019 (Dkt. No. 108.)

28 WHEREAS, Plaintiffs and CitiStaff are continuing to meet and confer to achieve an informal

1 resolution of their dispute.

2 WHEREAS Plaintiffs and CitiStaff agree to extend Plaintiffs' deadline to raise a dispute  
3 regarding CitiStaff's objections to the PMK Deposition Notice to Monday, November 4, 2019.  
4

5 NOW THEREFORE, Plaintiffs and CitiStaff hereby agree and stipulate as follows:

6 1. Plaintiffs' deadline to raise a dispute with the Court with respect to CitiStaff's objections to  
7 Plaintiffs' Third Amended Notice of Videotaped Deposition of CitiStaff Solutions, Inc.'s  
8 Person Most Knowledgeable Pursuant to Fed. R. Civ. P. 30(B)(6); and Request for  
9 Production of Documents is extended to November 4, 2019.  
10

11 **IT IS SO STIPULATED.**

12 Dated: October 30, 2019 CALIFORNIA CIVIL RIGHTS LAW GROUP  
13

14 By \_\_\_\_\_ /s/ Lawrence A. Organ  
15 Lawrence A. Organ  
16 Navruz Avloni  
17 J. Bernard Alexander  
18 Attorneys for Plaintiffs  
19 DEMETRIC DI-AZ and OWEN DIAZ  
20

21 Dated: October 30, 2019 LAFATETTE & KUMAGAI  
22

23 By \_\_\_\_\_ /s/ Cheryl A. Stevens  
24 Gary Lafayette  
25 Cheryl Stevens  
26 Susan Kumagai  
27 Attorneys for Defendant  
28 CITISTAFF SOLUTIONS, INC.

29 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

30 DATED: \_\_\_\_\_

31 HONORABLE WILLIAM H. ORRICK